FILED

UNITED STATES DISTRICT COURT ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

NOV 2 0 2019

MITCHELL R. ELFERS FOR THE DISTRICT OF NEW MEXICO CLERK UNITED STATES OF AMERICA, CRIMINAL NO. <u>19-4</u>219 mV Plaintiff, Count 1: 18 U.S.C. § 1512(k): VS. Conspiracy to Use Physical Force and Threats Against a Witness, Victim, KIUANTE ANTWAN GREEN and ALANDAS JA'QUELL Informant; JAMERA QUANE CHAMBERS, Count 2: 18 U.S.C. § 1512(a)(2): Use of Physical Force and Threats Against a Defendants. Witness, Victim, Informant; 18 U.S.C. § 2: Aiding and Abetting; Count 3: 18 U.S.C. § 1594(c): Conspiracy to Engage in Obstruction; Count 4: 18 U.S.C. § 1591(d): Obstruction of Enforcement of 18 U.S.C. § 1591; 18 U.S.C. § 2: Aiding and Abetting.

INDICTMENT

The Grand Jury charges:

Count 1

On or about November 5, 2019, in Bernalillo County, in the District of New Mexico, the defendants, **KIUANTE ANTWAN GREEN** and **ALANDAS JA'QUELL JAMERA QUANE CHAMBERS**, conspired, combined, confederated, agreed, and acted interdependently with each other, and with others known and unknown to the Grand Jury, to use physical force and the threat of physical force against Jane Doe, by raping her and threatening to kill and physically harm her, with the intent to influence, delay, and prevent Jane Doe's testimony in an official

proceeding, *United States v. Jackson et al.*, 2017-CR-03426, in the United States District Court for the District of New Mexico.

In violation of 18 U.S.C. § 1512(k).

Count 2

On or about November 5, 2019, in Bernalillo County, in the District of New Mexico, the defendants, **KIUANTE ANTWAN GREEN** and **ALANDAS JA'QUELL JAMERA QUANE CHAMBERS**, knowingly used physical force and the threat of physical force against Jane Doe, by raping her and threatening to kill and physically harm her, with the intent to influence, delay, and prevent Jane Doe's testimony in an official proceeding, *United States v. Jackson et al.*, 2017-CR-03426, in the United States District Court for the District of New Mexico.

In violation of 18 U.S.C. § 1512(a)(2) and 18 U.S.C. § 2.

Count 3

On or about November 5, 2019, in Bernalillo County, in the District of New Mexico, the defendants, **KIUANTE ANTWAN GREEN** and **ALANDAS JA'QUELL JAMERA QUANE CHAMBERS**, knowingly and willfully conspired, combined, confederated, agreed, and acted interdependently with each other, and with others known and unknown to the Grand Jury, to obstruct the enforcement of Title 18, United States Code, Section 1591.

In violation of 18 U.S.C. § 1594(c).

Count 4

On or about November 5, 2019, in Bernalillo County, in the District of New Mexico, the defendants, KIUANTE ANTWAN GREEN and ALANDAS JA'QUELL JAMERA QUANE CHAMBERS, knowingly and willfully obstructed and attempted to obstruct the enforcement of

Title 18, United States Code, Section 1591.

In violation of 18 U.S.C. § 1591(d), and 18 U.S.C. § 2.

A TRUE BILL:

/s/

FOREPERSON OF THE GRAND JURY

Assistant United States Attorney

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